

Remarks

Applicant has reviewed this Application in light of the final Office Action mailed July 25, 2005. Applicant has amended the Specification and independent Claims 10, 19, 21, and 23 to correct minor typographical errors. Applicant respectfully requests reconsideration and allowance of all pending claims.

Applicant has not Cancelled Claim 3 or Claim 12

On Page 2 of the Office Action mailed July 25, 2005, the Examiner states, "Claims 1-22 are subject to examination." The Examiner then states, "Claims 3 and 12 are cancelled." Applicant has not cancelled Claim 3 or Claim 12 and believes Claims 3 and 12 are both currently pending in this Application. Applicant respectfully requests clarification on the status of Claims 3 and 12.

Independent Claims 1, 18, 20, and 22 are Allowable Over *Schettler*

The Examiner rejects independent Claims 1, 18, 20, and 22 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,787,252 to Schettler et al. ("*Schettler*").

Schettler merely discloses a discovery mechanism for determining network topology data, a layout mechanism for converting the network topology data to map data and for driving a display with the map data, and a filtering system that filters objects from the topology data. (Column 2, Lines 23-47). In *Schettler*, a network, a segment, a computer, a router, a repeater, and a repeater are examples of an object. (Column 6, Lines 41-43).

The filtering system in *Schettler* filters objects from the topology data by type. (Column 7, Lines 32-34). The filtering system maintains a filtering library that specifies objects for communication from the discovery mechanism to the layout mechanism. (Column 6, Lines 51-55). Example filters in the filtering library include filters for various nodes, routers, connectors, and segments. (Column 8, Lines 60-63). The filtering library

determines whether an object is an allowable object or a nonallowable object. (Column 6, Lines 55-57). The layout mechanism converts allowable objects into map data and displays them, whereas the layout mechanism does not convert nonallowable objects into map data or display them. (Column 6, Lines 57-60).

In contrast, independent Claim 1 recites:

A method for analyzing links between components of a computer system, comprising:
receiving input associated with a level of abstraction;
determining the level of abstraction based on the input;
filtering network links for display based on the level of abstraction;
and
displaying the filtered network links to present a layered network diagram.

Independent Claims 18, 20, and 22 are similar to independent Claim 1.

Schettler fails to disclose, teach, or suggest ***filtering network links for display based on the level of abstraction***, as recited in independent Claim 1. The filtering system in *Schettler* filters objects out of network topology data only by type. Therefore, even assuming for the sake of argument that objects in *Schettler* could be properly considered ***network links***, as recited in independent Claim 1, *Schettler* would still fail to disclose, teach, or suggest filtering any such objects ***based on the level of abstraction***, as recited in independent Claim 1. Moreover, Because *Schettler* fails to disclose, teach, or suggest ***filtering network links for display based on the level of abstraction***, as recited in independent Claim 1, *Schettler* also necessarily fails to disclose, teach, or suggest ***displaying the filtered network links to present a layered network diagram***, as further recited in independent Claim 1.

For at least these reasons, independent Claims 1, 18, 20, and 22 are allowable over *Schettler*. Applicant respectfully requests reconsideration and allowance of independent Claims 1, 18, 20, and 22 and all their dependent claims.

Independent Claims 10, 19, 21, and 23 are Allowable Over *Schettler*

The Examiner also rejects independent Claims 10, 19, 21, and 23 under 35 U.S.C. § 102(b) as being anticipated by *Schettler*.

Applicant discusses *Schettler* above.

In contrast to *Schettler*, independent Claim 10, as amended, recites:

A method for network analysis by presenting a layered network diagram on a visualization workstation, comprising:
storing in an object repository, at least one object representing a link between components of a network;
receiving a request to present the network topology represented by the at least one object in the object repository;
receiving input associated with a level of abstraction;
determining the level of abstraction based on the input;
filtering the at least one object based on the level of abstraction; and
displaying the at least one filtered object to present a layered network diagram.

Independent Claims 19, 21, and 23 are similar to independent Claim 10.

Schettler fails to disclose, teach, or suggest ***filtering the at least one object based on the level of abstraction***, as recited in independent Claim 10. As discussed above, the filtering system in *Schettler* filters objects out of network topology data only by type. Therefore, even assuming for the sake of argument that objects in *Schettler* could be properly considered ***the at least one object***, as recited in independent Claim 10, *Schettler* would still fail to disclose, teach, or suggest filtering any such objects ***based on the level of abstraction***, as recited in independent Claim 10. Moreover, Because *Schettler* fails to disclose, teach, or suggest ***filtering the at least one object based on the level of abstraction***, as recited in independent Claim 10, *Schettler* also necessarily fails to disclose, teach, or suggest ***displaying the at least one filtered object to present a layered network diagram***, as further recited in independent Claim 10.

For at least these reasons, independent Claims 10, 19, 21, and 23 are allowable over *Schettler*. Applicant respectfully requests reconsideration and allowance of independent Claims 10, 19, 21, and 23 and all their dependent claims.


Conclusion

For at least the foregoing reasons, Applicant respectfully requests allowance of all pending claims.

If a telephone conference would advance prosecution of this Application, Applicant invites the Examiner to contact Travis W. Thomas, Attorney for Applicant, at 214.953.6676.

Applicant believes no fee is due. Nonetheless, the Commissioner is hereby authorized to charge any fee and credit any overpayment to Deposit Account No. 02-0384 of Baker Botts LLP.

Respectfully submitted,
BAKER BOTTS L.L.P.
Attorneys for Applicant

Handwritten signature of Travis W. Thomas, consisting of a stylized 'T' followed by a horizontal line and a checkmark-like flourish.

Travis W. Thomas
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